

Please make sure you comply with the GDPR when preparing an application for a Twinning project. The NCP provides you with an example below. The template does not claim to be exhaustive or cover all scenarios, but is intended only for basic guidance. Please adapt the template to suit your specific circumstances and, if necessary, contact your data protection officer, especially with regard to the eventuality that data might be transferred to recipients in third countries (Articles 49 ff. GDPR). You are also requested to ensure compliance with the provisions of the GDPR when drawing up any consortium agreements.

Applying for and conducting EU Twinning projects

Here: Information from the ... (*federal ministry/authority*) to data subjects in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR)

Applying for and conducting Twinning projects entails the processing of personal data as submitted by you for the purpose of participating in a project (CV / Europass CV as well as any other information provided in writing or orally concerning your contact details, professional career, education, personal skills and – in the case of Resident Twinning Advisors – salary details).

These personal data are used by the ... (*federal ministry/authority*) to assess whether your participation in Twinning projects generally and in the project in question is admissible and appropriate. The information (your CV) may also be included in full in the application for a given Twinning project. In case the application is successful, the CVs become part of the Twinning Grant Contract to be signed with the EU. During project execution, they are used by the ... (*federal ministry/authority*) to manage the project.

The ... (*federal ministry/authority*) sends the project application to the National Contact Point for Twinning (at the Federal Ministry for Economic Affairs and Energy) for the purpose of a formal review and subsequent forwarding to the competent EU office or contracting authority of the partner country. The Twinning Grant Contract which may have to be concluded as well as any amendments/changes made to the contract during project execution are sent to the EU offices and to the relevant project partner authority outside the EU.

This may necessitate the transfer of personal data pursuant to Section 25 of the Federal Data Protection Act in conjunction with Article 49(1)d, (4) of the General Data Protection Regulation to authorities in non-EU countries. According to these provisions, the transmission of data to countries outside the EU is permissible on important grounds of public interest. The tasks assigned to the National Contact Point for Twinning in the EU's Twinning Manual, particularly the coordination of Twinning applications and the international exchange of data this requires, represent such important grounds of public interest.

The ... (*federal ministry/authority*) contracts 'Twinning service providers' (*e.g.* ...) for applications and the execution of Twinning projects. These service providers are also given access to the personal data and CVs so that they can discharge their duties within the Twinning project in question. The processing of data by the ... (*federal ministry/authority*)

and the transfer of data to third parties, including in non-EU countries, for the purpose of conducting Twinning projects – an undertaking that lies in the public interest of the EU and Germany – are absolutely necessary and therefore admissible (Article 6(1)e, Article 49(1) sentence 1(d) GDPR; Sections 3, 25 Federal Data Protection Act).

Responsibility for the processing of personal data lies with the ... **(address + contact details of federal ministry/authority)**

If you have any specific questions about the protection of your data at the ... **(federal ministry/authority)**, please contact the data protection officer at the ... **(federal ministry/authority)**:

Data Protection Officer at the ... **(federal ministry/authority)** ... **(address + contact details of federal ministry/authority)**

The following are a few **notes on data protection** and your rights in this context:

Your data are stored at the ... **(federal ministry/authority)** for as long as this is necessary for the execution of duties within a given Twinning project in compliance with legal and contractual retention periods as set out by the Federal Budget Code and the Twinning contract respectively.

Your data may be registered and stored in the Twinning expert database of the ... **(federal ministry/authority)**, where it can be accessed by **(relevant staff/divisions)**. Should your entry need to be removed from the database for reasons such as the assumption of a new role, you are kindly requested to inform the ... **(email/authority contact details)**.

According to the General Data Protection Regulation (GDPR), you are entitled to the following **rights**:

- In case your personal data are being processed, you are entitled to obtain information about this data (Article 15 GDPR).
- Should any inaccurate personal data have been processed, you are entitled to have this data rectified or – taking into account the purposes of the processing – completed (Article 16 GDPR).
- Provided that the necessary statutory requirements are met, you may demand the erasure or restriction of processing of your data or object to the processing (Articles 17, 18, 21 GDPR).
- If the processing of your data is based on consent or a contract and it is carried out by automated means, you may have a right to data portability (Article 20 GDPR).

- Should you exercise your rights as mentioned above, the ... **(federal ministry/authority)** shall assess whether the legal requirements have been met accordingly.
- You have the right to lodge a complaint with the **(for federal authorities: Federal Commissioner for Data Protection and Freedom of Information (BfDI), Husarenstraße 30, 53117 Bonn; for Länder authorities: data protection officer of the Land in question + address)**.